

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Miranda Tsang,  
Debtor,

Bankruptcy No. 20-13636-amc  
Chapter 13

ABS Loan Trust VI,  
Secured Creditor,

Related to Document No. 96

Miranda Tsang,  
Debtor / Respondent,

Hearing Date: April 19, 2023  
Time: 10:00 a.m.

and  
SCOTT F. WATERMAN,  
Trustee / Respondent.

**OBJECTION OF  
ABS LOAN TRUST VI  
TO CONFIRMATION OF THIRD MODIFIED CHAPTER 13 PLAN**

ABS Loan Trust VI (“Secured Creditor”), by and through its counsel, Roger Fay, Esquire, as and for its objection to confirmation of Debtor’s Third Modified Chapter 13 Plan, respectfully states as follows:

1. Debtor is Miranda Tsang.
2. On September 10, 2020, Debtor filed a petition pursuant to Chapter 13 of Title 11 of the United States Code. Debtor is the owner of the real property commonly known as 1617 Hampton Rd, Havertown, PA 19083 (the “Property”).
3. Secured Creditor holds the second mortgage on the Property.
4. Secured Creditor filed a Proof of Claim on September 18, 2020 at Claim No. 4.
5. As more fully set forth in the aforementioned Proof of Claim, as of the date of the filing of the instant Chapter 13 petition, total arrears due to Secured Creditor through the Plan are \$12,001.38.
6. Debtor's Third Modified Chapter 13 Plan does not provide for payment of mortgage arrears.

7. The Third Modified Chapter 13 Plan does not provide for Mortgagee to receive distributions with a value equal to the allowed amount of its claim as required by 11 U.S.C. § 1325(a)(5)(B)(ii).

8. The Third Modified Chapter 13 Plan is not feasible.

9. Secured Creditor objects to the Debtor's Third Modified Chapter 13 Plan as same does not propose to cure the entire pre-petition delinquency due to Secured Creditor and thus the Plan is not feasible as filed.

WHEREFORE, Secured Creditor respectfully requests that confirmation of Debtor's Third Modified Chapter 13 Plan be denied unless modified to provide for payment of pre-petition arrears in full, as set forth above, due to Secured Creditor, and for such other just and appropriate relief as the Court may deem proper.

Respectfully submitted,  
MILSTEAD & ASSOCIATES, LLC

DATED: April 11, 2023

/s/ Roger Fay, Esq., ID No. 315987  
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Attorneys for Secured Creditor

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**CERTIFICATION OF SERVICE**

Roger Fay, Esquire counsel for ABS Loan Trust VI, hereby certifies that a copy of the Objection to Third Modified Plan was served upon the following persons via electronic transmission or by regular first-class mail, postage pre-paid on April 11, 2023, addressed as follows:

SCOTT F. WATERMAN Chapter 13 Trustee 2901 St. Lawrence Ave. Suite 100 Reading, PA 19606 <i>via electronic transmission and regular mail</i>	ROBERT NEIL BRAVERMAN McDowell Law, PC 46 West Main Street Maple Shade, NJ 08034 <i>via electronic transmission and regular mail</i>
Miranda Tsang 1617 Hampton Road Havertown, PA 19083 <i>via regular mail</i>	

MILSTEAD & ASSOCIATES, LLC

DATED: April 11, 2023

By: /s/ Roger Fay, Esq., ID No. 315987  
14000 Commerce Parkway, Suite H  
Mount Laurel, NJ 08054  
(856) 724-1888  
Attorneys for Secured Creditor